

# **EXHIBIT 34**

DEA - Houston

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## Suspicious Orders

Title 21 CFR 1301.74(b)

Requires registrant to design & operate a system to disclose suspicious orders of controlled substances to the DEA

- ★ The requirement is to report suspicious orders, not suspicious sales after the fact.

• want better info - scrub for truly suspicious

• Know your customer

## Suspicious Orders

### ➤ Suspicious orders include:

1. Unusual size
2. Deviations from a normal pattern
3. Unusual frequency

- Each controlled substance distributor must define their own parameters for a suspicious order.
- Suspicious order monitoring programs must evolve with the demands of fighting the constantly changing illicit drug market.

• exceeding a set threshold not necessarily suspicious

## Suspicious Orders

The responsibility for making the decision to ship rests with the supplier.

- ★ Registrants who routinely report suspicious orders yet fill these orders, with reason to believe they are destined for the illicit market, are failing to maintain effective controls against diversion.

★ looking for a pattern

### SAMHSA

#### 2005 National Survey on Drug Use

6.4 million persons aged twelve and older admitted to using prescription drugs for non-medical reasons

- 4.7 million used narcotic pain relievers
- 1.8 million used tranquilizers
- 1.1 million used stimulants
- 272,000 used sedatives

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### SAMSHA

#### 2005 National Survey on Drug Use

The illicit drug categories with the largest number of recent initiates:

1. Non-medical use of pain relievers
2. Marijuana
3. Non-medical use of tranquilizers
4. Inhalants
5. Cocaine

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### FURTHER INFORMATION

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